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February 26, 2021

**VIA ECOURTS**

Clerk  
District of New Jersey  
United States District Court  
50 Walnut Street  
Newark, New Jersey 07101

Re: Xiamen ITG Group Corp, LTD. v. Crystal Vogue, Inc.  
Civil Action No. 2:21-cv-02813

Dear Sir/Madam

We represent the Defendant, in the above referenced matter. Defendant respectfully submits this letter to advise that Defendant is invoking provisions of L.Civ.R 7.1(d)(5) for an automatic extension of two dates.

Firstly, we have not been timely served with the pending motion. Therefore, the return date should be moved to April 5, 2021. In addition, pursuant to L.Civ.R 7.1(d)(5), we respectfully request an extension of time to oppose, cross move, and/or respond to the Motion to Enforce which is a dispositive motion. Since my client has not yet been served with process in this matter, the original return date should be April 5, 2021. Pursuant to L. Civ. R 7.1(d)(5) we request that the pending motion be adjourned to the next motion date which is **April 19, 2021**.

Secondly, we respectfully request pursuant to L. Civ. R 6.1 we request that the time to move, plea or otherwise response to the pending Petition to be extended by fourteen (14) days. Since Plaintiff has not yet served Defendant, the earliest the petition would be due is March 19, 2021. The fourteen day extension requested would place the due date as **April 2, 2021**.

This is the first time a request for these extensions have been made. The reason for these requests are that there is insufficient time to prepare an opposition to the pending motion if the return date remains unchanged. There is also insufficient time to move, plea or otherwise respond to the petition if an extension is not granted. I am currently in the middle of a trial in Rockland County Surrogates Court and I have a number of depositions scheduled in March.

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We appreciate the Court's attention to this request.

Respectfully,

A handwritten signature in blue ink, appearing to read "Michael S. Horn", with a stylized flourish at the end.

MICHAEL S. HORN

cc: Counsel of Record (via ECF)  
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